Hearing Date: March 30, 2009 at 10:00 a.m.

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Counsel to the Debtors and Debtors in Possession

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	)	Chapter 11
CIRCUIT CITY STORES, INC., et al.,	)	Case No. 08-35653-KRH
Debtors.	) ) )	Jointly Administered

NOTICE OF MOTION AND NOTICE OF HEARING ON (I) DEBTORS'
MOTION FOR ORDER APPROVING LETTER AGREEMENT BY AND AMONG THE
DEBTORS AND A JOINT VENTURE COMPRISED OF GREAT AMERICAN
GROUP WF, LLC, HUDSON CAPITAL PARTNERS, LLC, SB CAPITAL
GROUP, LLC AND TIGER CAPITAL GROUP, LLC PURSUANT TO
BANKRUPTCY CODE SECTIONS 105 AND 363 AND BANKRUPTCY RULE
9019; (II) MOTION TO SHORTEN AND LIMIT NOTICE THEREON; (III)
MOTION TO FILE CERTAIN DOCUMENTS UNDER SEAL IN CONNECTION
THEREWITH; AND (IV) MOTION TO EXPEDITE HEARING ON THE
FOREGOING

**PLEASE TAKE NOTICE** that on March 26, 2009, the above-captioned debtors and debtors-in-possession (the "Debtors") filed the following:

Motion for Order Approving Letter Agreement By and Among the Debtors and a Joint Venture Comprised of Great American Group WF, LLC, Hudson Capital Partners, LLC, SB Capital Group, LLC and Tiger Capital Group, LLC Pursuant to Bankruptcy Code Sections 105 and 363 and Bankruptcy Rule 9019 (the "9019 Motion");

Motion to Shorten and Limit Notice of the 9019 Motion;

Motion to File Certain Documents Under Seal in connection with the 9019 Motion; and a

Motion to Expedite Hearing in connection with the foregoing (collectively, the "Motions").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.) Under Local Bankruptcy Rule 9013-1, unless a written response to the Motions is filed with the Clerk of the Court and served on the moving party, the trustee and those parties as required by the Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management and Administrative Procedures (entered on November 13, 2008 at Docket No. 130) (the "Case Management Order") by the requested expedited hearing date, the Court may deem any opposition waived, treat the Motions as conceded, and issue an order granting the requested relief without further notice or hearing. If you do not want the Court to approve the Motions, or if you want the Court to consider your views on the Motions, then you or you attorney must:

[X] File with the Court, either electronically or at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before <a href="March 30">March 30</a>, 2009 at 10:00 a.m.

Clerk of Court United States Bankruptcy Court 701 East Broad Street, Suite 4000 Richmond, Virginia 23219

- [X] Pursuant to the Case Management Order, you must also serve a copy of any written response and request for hearing by the foregoing date via electronic mail on the following: (i) the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' prepetition lenders, and counsel to the agents for the Debtors' postpetition lenders; (ii) the 2002 List; and (iii) those additional parties as required by the Case Management Order (all of which are defined in the Case Management Order), which can be found at www.kccllc.net/circuitcity.
- [X] Attend a hearing before the Honorable Kevin Huennekens, United States Bankruptcy Judge, <a href="mailto:attentary">at</a>
  10:00 a.m. (Eastern Standard Time) on March 30,

  2009 at the United States Bankruptcy Court, Room 5000, 701 East Broad Street, Richmond, Virginia 23219. If you or your attorney do not attend the hearing, the Court may grant the relief requested in the Motions.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motions and may enter an order granting the relief requested.

Dated: March 26, 2009 SKADDEN, A Richmond, Virginia FLOM, LLP

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